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SHERIFF CHRISTINA CORPUS

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SHERIFF CHRISTINA CORPUS,

Plaintiff,

v.

DAVID CANEPA, President and Member of the
 San Mateo County Board of Supervisors,
 NOELIA CORZO, Vice-President and Member
 of the San Mateo County Board of Supervisors,
 JACKIE SPEIER, Member of the San Mateo
 County Board of Supervisors,
 RAY MUELLER, Member of the San Mateo
 County Board of Supervisors,
 LISA GAUTHIER, Member of the San Mateo
 County Board of Supervisors, and
 DOES 1-10,

Defendants.

Case No.: 3:25-CV-5962

**DECLARATION OF W.S. WILSON
 LEUNG IN SUPPORT OF COMPLAINT
 FOR DECLARATORY AND INJUNCTIVE
 RELIEF**

~~Vol. I of II, Exhibits 1-5~~

I, W.S. WILSON LEUNG, hereby declare as follows:

1 1. I am an attorney admitted into the state bars of California and New York and am Senior
2 Counsel with the law firm of Murphy, Pearson, Bradley & Feeney (“Murphy Pearson”) in San Francisco,
3 California. Murphy Pearson represents Christina Corpus, the duly elected Sheriff of San Mateo County,
4 Plaintiff in the above-captioned matter.

5 2. I respectfully submit this Declaration in support of Plaintiff’s Complaint Seeking
6 Declaratory and Injunctive Relief filed in the Northern District of California, asking the Court to enjoin
7 Defendants, the current members of the San Mateo County Board of Supervisors, from removing her
8 from office pursuant to Article 412.5 of the San Mateo County Charter and the removal procedures
9 Defendants have promulgated. I respectfully request that this Declaration and its attached exhibits be
10 lodged with the Court. Copies of them will also be provided to counsel for Defendants.

11 3. Attached as Exhibit 1 hereto is a true and correct copy of the investigations report
12 prepared by retired California state judge Ladoris Cordell. For the sake of brevity, the exhibits to this
13 report are not included. In addition, the report contains redactions; I do not have access to an unredacted
14 version.

15 4. Attached as Exhibit 2 hereto, and for the sake of brevity, is a true and correct copy of the
16 Executive Summary and list of recommendations of an assessment of the San Mateo County Sheriff’s
17 Office conducted by Meliora Public Safety Consulting. The full assessment is almost 700 pages long.

18 5. Attached as Exhibit 3 hereto is a true and correct copy of a November 12, 2024 email sent
19 under the name of Mike Callagy, San Mateo County Executive, advising recipients of the availability of
20 the report of Ladoris Cordell.

21 6. Attached as Exhibit 4 hereto is a true and correct copy of the minutes of the November
22 13, 2024 meeting of the San Mateo County Board of Supervisors.

23 7. Attached as Exhibit 5 hereto is a true and correct copy of a transcript of the November
24 19, 2024 meeting of the San Mateo County Board of Supervisors.

25 8. Attached as Exhibit 6 hereto is a true and correct copy of a transcript of the December 3,
26 2024 meeting of the San Mateo County Board of Supervisors.

27 9. Attached as Exhibit 7 hereto is a true and correct copy of John Taylor’s Grievance Form
28 filed while he was in custody at Maguire Correctional Facility in San Mateo County.

1 10. Attached as Exhibit 8 hereto is a true and correct copy of incident report dated November
2 5, 2024 relating to threats against Plaintiff made by John Taylor.

3 11. Attached as Exhibit 9 hereto is a true and correct copy of an incident report dated February
4 18, 2025 relating to threats against Plaintiff made by John Taylor.

5 12. Attached as Exhibit 10 hereto is a true and correct copy of a Tarasoff Notification
6 provided to Sheriff Corpus relating to John Taylor's threats.

7 13. Attached as Exhibit 11 hereto is a true and correct copy of Article 412.5 of the San Mateo
8 County Charter, as part of the San Mateo County Board of Supervisors' proposed amendment
9 (Ordinance 4899); I could not find an official adopted copy of Article 412.5.

10 14. Attached as Exhibit 12 hereto is a true and correct copy of the investigation report written
11 by Keker, Van Nest & Peters. For the sake of brevity, the exhibits to this report are not included.

12 15. Attached as Exhibit 13 hereto is a true and correct copy of the removal procedures
13 promulgated by the San Mateo County Board of Supervisors pursuant to Article 412.5 governing the
14 removal proceeding of Sheriff Corpus.

15 16. Attached as Exhibit 14 hereto is a true and correct copy of the transcript of the June 11,
16 2025 Pre-Removal Conference conducted by Chief Probation Officer John Keene.

17 17. Attached as Exhibit 15 hereto is a true and correct copy of the post June 11, 2025 Pre-
18 Removal Conference recommendation of Chief Probation Officer John Keene.

19 18. Attached as Exhibit 16 hereto is a true and correct copy of Sheriff Corpus's appeal of the
20 post June 11, 2025 Pre-Removal Conference recommendation of Chief Probation Officer John Keene.

21 19. Attached as Exhibit 17 hereto is a true and correct copy of the Accusation against Sheriff
22 Corpus returned by the San Mateo County Civil Grand Jury on June 27, 2025.

23 Pursuant to Title 28, United States Code, Section 1746, I declare under penalty of perjury that
24 the foregoing is true and correct to the best of my knowledge.

25 DATED: July 15, 2025

26
27 By: 

28 W.S. Wilson Leung